

## Energy - Docket Optical System

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**From:** bberger@uci.edu  
**Sent:** Sunday, February 22, 2015 8:12 PM  
**To:** Energy - Docket Optical System  
**Subject:** DRECP NEPA/CEQA

California Energy Commission

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**09-RENEW EO-1**

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California Energy Commission  
Dockets Office, MS-4  
Docket No. 09-RENEW EO-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

To whom it may concern:

Please consider this letter as my comments and suggestions regarding the Draft Desert Renewable Energy Conservation Plan and EIR/EIS.

There are several issues I feel are of major concern:

1) The pace of technology and ongoing changes in energy development toward distributed energy has diminished the necessity of 20,000 MW. One of the alternatives of the DRECP really needs to be distributed energy (roof-top solar). In the approximately 8 years that the DRECP has been in development how many MW have been created in distributed energy, and what happens when the trend toward distributed power is extrapolated into the future? The DRECP is starting to look like an expensive dinosaur.

2) An issue that is not addressed in the plan is equity. From Exhibit 11 in the Executive Summary one can see that the preferred alternative has Imperial County accounting for approximately 38% of the Development Focus Area (DFA), yet Imperial County is only about 7% in area of the total acreage of the counties considered. Imperial County also gets shortchanged in mitigation at 33% of the total (Table II.3-41 in Vol. II). On the other side of the coin, San Diego County, while putting in hardly any land for the Preferred Alternative (about 0% when they are 7% in county area) get 7% of the mitigation distribution.

Obviously, the plan is placing lower conservation value on farm lands, but weren't those lands once pristine? I am not advocating using undisturbed lands for energy development. I think we should be considering scraping large-scale energy projects in the wild spaces of our desert and restoring damaged lands where we can.

3) No matter which alternative one chooses (other than the no-development alternative) there is a clear indication that certain areas are sacrifice zones for renewable energy development. Hardest hit are the western Mojave (Lancaster/Tehachapi), Lucerne, Adelanto Victorville, Barstow SW and E, Colorado River S of Needles, Blythe and N of the 10 from Desert Center to Blythe, and SE California (Brawley/EI Centro – Imperial Valley). Based on the socioeconomic conditions of many of these areas, the siting choices for energy development hints a lack of environmental justice. It is not surprising that disturbed lands are paired with low incomes. This is another reason why distributed energy provides a more equitable balance of who is affected by the development.

4) It is unclear from the DRECP what the distribution is of those who benefit from the renewable energy. It would appear that the rural is supporting the urban. Granted, the planet benefits from using renewable, compared to dirty energy, but at what cost? Solar fields, as they are currently developed, are huge swaths of bare, lifeless earth. It's as if we see killing the patient as the way to save them. Using existing rooftops and yards for solar energy doesn't destroy more desert and distributes the costs and benefits more equitably.

5) Although it is far-sighted to put forward a plan that considers the decommissioning stage of projects after their life span is over, it is unknown who will actually control the sites at that time. An escrow fund should be required for each site with constant deposits being necessary to maintain a permit to use the site. The full amount required to restore the site to its original condition should be achieved after no more than 10 to 15 years, and restoration should be its only purpose. The interest from these accounts after they reach their target value should be used to restore degraded lands.

I appreciate your concern in this matter and look forward to reviewing the final documents. Please keep me informed about this project using the address listed above.

Sincerely,  
Bradford W. Berger